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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JORGE OMAR ARREDONDO-GARCIA,  
  
Defendant.

CASE NO. 2:23-CR-0162-DAD-1  
  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER  
  
DATE: July 28, 2025  
TIME: 9:30 a.m.  
COURT: Hon. Dale A. Drozd

**STIPULATION**

1. By previous order, this matter was set for status on July 28, 2025. ECF No. 103. The Court previously indicated that this date was firm. *Id.*

2. As to defendant Arredondo-Garcia, the parties have reached a resolution, and the defendant is prepared to enter a guilty plea pursuant to a plea agreement. However, Counsel for defendant has indicated he needs one more week to coordinate the logistics of meeting with his client (who is in custody) and a court certified Spanish interpreter. Accordingly, the parties respectfully request a one-week continuance and that this Court set the matter for a change of plea as to defendant Arredondo-Garcia on August 4, 2025.

3. By this stipulation, the parties move to continue the hearing until August 4, 2025, and to exclude time between July 28, 2025, and August 4, 2025, under Local Code T4.

4. The parties agree and stipulate, and request that the Court find the following:

1 a) The government has represented that the discovery associated with this case  
2 includes over 100 gigabytes of discovery in electronic form, including investigative reports and  
3 related documents, surveillance video and photos, laboratory reports, wiretap intercepts from  
4 nine separate phones, and other evidence. Much of this evidence, including most of the  
5 intercepts and covert recordings, is in the Spanish language. All of this discovery has been either  
6 produced directly to counsel and/or made available for inspection and copying.

7 b) Counsel for defendant has arranged for a certified Spanish interpreter to meet with  
8 him and his client on August 1, 2025. Should this party ultimately not resolve by a change of  
9 plea as expected, Counsel for defendant desires additional time to review this discovery, review  
10 the current charges, to conduct investigation and research related to the charges, to discuss  
11 potential resolutions with his client, and to otherwise prepare for trial. The government does not  
12 object to the continuance.

13 c) Based on the above-stated findings, the ends of justice served by continuing the  
14 case as requested outweigh the interest of the public and the defendant in a trial within the  
15 original date prescribed by the Speedy Trial Act.

16 d) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
17 et seq., within which trial must commence, the time period of July 28, 2025 to August 4, 2025,  
18 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
19 because it results from a continuance granted by the Court at defendant's request on the basis of  
20 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
21 of the public and the defendant in a speedy trial.

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5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 22, 2025

KIMBERLY A. SANCHEZ  
Acting United States Attorney

By: /s/ ADRIAN T. KINSELLA  
ADRIAN T. KINSELLA  
Assistant United States Attorney

Dated: July 22, 2025

/s/ J. PATRICK MCCARTHY  
J. PATRICK MCCARTHY  
Counsel for Defendant  
JORGE OMAR ARREDONDO-GARCIA

### ORDER

Pursuant to the stipulation of the parties and good cause appearing, the status conference previously scheduled for July 28, 2025 is continued to August 4, 2025, at 9:30 a.m. for anticipated change of plea time is excluded between July 28, 2025, and August 4, 2025, under Local Code T4.

IT IS SO ORDERED.

Dated: July 23, 2025

Dale A. Drozd  
DALE A. DROZD  
UNITED STATES DISTRICT JUDGE